

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**SUPPLEMENT TO MOTION FOR APPOINTMENT OF FACILITATOR  
TO ASSIST THE PARTIES IN IMPLEMENTING VEBA FOR  
INDIVIDUALS RETIRING FROM THE CITY OF DETROIT  
AFTER 1/1/2015**

The City of Detroit files this supplement to its Motion For Appointment of Facilitator to Assist the Parties In Implementing a New VEBA For Certain Individuals Retiring From the City Of Detroit After 1/1/2015, Pursuant to Local Bankruptcy Rules 7016-2 and 9014-1 (“Motion”) [Doc. No. 11198], and states as follows:

Richard Mack, counsel for AFSCME, sent an email late in the day on May 31. Mr. Mack advised that he and his client had not understood the City's position on the Side Letter. Apparently, the Side Letter is acceptable to AFSCME in the form appended to the Motion, and with the deletion of the reference to the newly created water authority. Mr. Mack advised he would file a formal response to the Motion laying this out for the Court.

Mr. Mack also advised that AFSCME would not oppose appointment of a facilitator to assist the parties in getting the new VEBA up and running. The City has proposed a facilitator to AFSCME and it hopes to hear soon if that individual is agreeable. If so, the City would propose dismissing the Motion without prejudice. At this time, the City is not requesting that the Court set an expedited hearing on the Motion. However, if the parties are unable to come to an agreement by June 3, 2016, the City will renew its request for an expedited hearing with this Court.

Dated: June 2, 2016

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

By: /s/ Marc N. Swanson  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
[swansonm@millercanfield.com](mailto:swansonm@millercanfield.com)

- and -

CITY OF DETROIT LAW DEPARTMENT

Charles N. Raimi (P29746)  
2 Woodward Avenue, Suite 500  
Detroit, Michigan 48226  
Phone: (313) 237-0470  
Email: [raimic@detroitmi.gov](mailto:raimic@detroitmi.gov)

Attorneys for the City of Detroit

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 1, 2016, a copy of the foregoing *Supplement to Motion For Appointment of Facilitator to Assist the Parties In Implementing a New VEBA For Certain Individuals Retiring From the City Of Detroit After 1/1/2015* was served upon counsel to AFSCME, via first class mail and electronic mail, as follows:

Richard G. Mack, Jr.  
MILLER COHEN PLC  
600 West Lafayette Boulevard  
4th Floor  
Detroit, MI 48226  
[richardmack@millercohen.com](mailto:richardmack@millercohen.com)

By: /s/ Marc N. Swanson  
Marc N. Swanson